

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

BRUCE CHARLES, on behalf of himself \* CIVIL ACTION NO.:  
and all other similarly situated prisoners \* 5:18-CV-00541-EEF-MLH  
at David Wade Correctional Center, \*  
\* JUDGE ELIZABETH E. FOOTE  
\*  
\* and \*  
\*  
\* The ADVOCACY CENTER, \*  
\* USMJ MARK L. HORNSBY  
PLAINTIFFS, \*  
\*  
\* VS. \* CLASS ACTION  
\*  
\* JAMES M. LEBLANC, *et al.*, \*  
\*  
\* DEFENDANTS. \*

**DECLARATION OF MELANIE BRAY**

I, Melanie A. Bray, declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, based on person knowledge, as follows:

1. I am over 18 years of age and have personal knowledge of the facts set forth herein. If called as a witness, I could and would testify competently to them.
2. I am employed by Disability Rights Louisiana (DLRA), formerly known as the Advocacy Center, as an attorney and have served as lead counsel for the Plaintiffs in the above named and numbered case since November 2020.
3. It is DLRA's policy and practice for staff to record their time contemporaneously into our client management and time recording system. I have contemporaneously recorded my time as have the staff I have supervised as part of this litigation or supervised generally in my role within the agency.

4. The billing entries attached as Exhibit 1-A constitute a contemporaneous log of the time I expended in this matter since submission of our first fee motion.

5. Since the submission of the first fee motion (ECF. No. 805) I have devoted 73.7 total hours to this matter, as detailed in **Exhibit 1-A**. I have reduced my total hours by 9.15 to remove administrative time or time that was duplicative. DRLA is seeking payment for 64.55 hours of my time. The time expended and the costs incurred have been reasonable and the records submitted are an accurate reflection of my hours expended in this case. I am requesting an hourly rate of \$300.

6. DRLA's legal assistant, **Kellie "Plum" Birk**, has expended a total of 443.1 hours reading and responding to class member mail to respond to their queries and concerns, as well as having phone calls with class members. Ms. Birk has provided extensive support to the litigation for both the attorneys and class members. Ms. Birk's time has been reduced by 43 to remove administrative time or time that was duplicative. DRLA is seeking payment for 400.95 hours of Ms. Birk's time at an hourly rate of \$108, as detailed in **Exhibit 1-B**.

7. Attached hereto as **Exhibit 1-C** is an accounting of postage costs incurred in this matter to maintain consistent contact with our clients and the class at large regarding this case. The postage cost is reasonable and necessary as it is the primary mode of communication we have with prisoners. The total cost for the mass mailings necessary to communicate with the whole class is \$2,255.75. *Exhibit 1-C*, at p.1 The total cost for communicating with individual class members and clients is \$594.73. *Id.*, at 6. The total of all postage costs is \$2,850.48. *Id.*

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 27, 2025.

/s/ Melanie Bray  
Melanie Bray

Staff	Date	Time Worked	Time Requested	Activity
M. Bray	08/16/2024	5.6	5.6	Reviewing and revising MISO attorney fees, finalizing the time records and labeling as exhibits, finalizing declarations in support of fee motion
M. Bray	08/16/2024	0.4	0.4	Finalized Motion for attorney fees and costs for DWCC, shared with Dalton for his review before we file
M. Bray	08/16/2024	0.4	0.4	Added a TOC to the MISO Fees. Will need to create the table of authorities tomorrow when we pull it down from Word
M. Bray	08/17/2024	1	1	Reviewing motion for leave to file excess pages for fees motion. Created TOA.
M. Bray	08/17/2024	0.6	0.6	Reviewing and revising my declaration for fees
M. Bray	08/17/2024	1	1	Finalized pleadings for motion for fees and costs. Had a lot of difficulty with e-filing due to file size, but was finally able to get it all filed.
M. Bray	08/17/2024	0.2	0	E-filed bill of costs for DWCC
M. Bray	08/20/2024	0.4	0.4	Had a call with Katie re. notice of fees for a class for DWCC. Sent an email to Katie and Dalton re same.
M. Bray	08/21/2024	0.5	0.5	Call with Katie re. the notice of fees for DWCC. Sent an email to Katie and Dalton to recap and get us all on the same page.
M. Bray	08/22/2024	0.5	0.5	Call with Katie and Dalton re. notice to the class for attorney fees and costs
M. Bray	08/23/2024	3	3	Revising the notice for fees and the notice to be sent to the class for DWCC
M. Bray	08/23/2024	1	1	Revising the notice for fees and the notice to be sent to the class for DWCC. Reviewed the revisions with Dalton and discussed strategy and next steps.
M. Bray	08/26/2024	0.5	0.5	Reviewing and revising motion for notice of fees for DWCC. Discussed with Dalton the revisions.
M. Bray	08/26/2024	0.8	0.8	Emailed Katie the motion for notice for fees and the notice for the class for her final review. Once it's good, I will send to Defendant attorneys for consent before filing.
M. Bray	08/26/2024	0.2	0	Emailed the motion and proposed notice to the class to Andrew Blanchfield for DWCC for his review and possible consent before filing.
M. Bray	08/26/2024	0.3	0.3	Call with Dalton re. filing for notice for fees and Defendants' request to consent to a 90 day stay on their response to our motion for fees
M. Bray	08/26/2024	0.7	0.7	Finalized the notice for fees and filed for DWCC. Downloaded ECF copies and saved to Dropbox
M. Bray	08/27/2024	1.4	0	Review of binders to be sent to Judge Foote for DWCC. Created new index for the binders as well as cover pages. Updated the exhibits and prepared for sending via FedEx for Dalton to drop off.
M. Bray	08/28/2024	0.5	0.5	Zoom call with Curtis Belton at EHCC
M. Bray	08/29/2024	1.7	1.7	DWCC calls
M. Bray	08/29/2024	0.2	0.2	Call with Dalton to debrief after my DWCC calls
M. Bray	09/17/2024	0.4	0.4	Met with Plum to briefly discuss the incoming DWCC letters and who should be on the call list for this week.
M. Bray	09/19/2024	3.5	3.5	Calls with 6 prisoners at DWCC
M. Bray	09/20/2024	0.2	0	Discussed Judge Foote's order for DWCC, she denied our cross motion
M. Bray	09/26/2024	0.2	0	Received an order on our motion to notify the class of the fee motion, deferred until scheduling order reset by 5th Circuit. Downloaded and saved to Dropbox
M. Bray	09/26/2024	0.2	0	Drafted and sent response to Morgan with AO's office on her request for DWCC to file something with the 5th Circuit
M. Bray	09/26/2024	0.2	0	Call with Dalton to discuss DWCC and the requests for response we received
M. Bray	10/02/2024	0.3	0.3	Discussed the review of C. Turner's records with Plum for Justin Harrell
M. Bray	10/02/2024	0.3	0	Received a call from Bill Van der Pol at ADAP, he was calling to discuss the DWCC case
M. Bray	11/07/2024	0.6	0.6	Met with Plum to discuss DWCC project to review call memos and identify individuals for affidavits, then drafting the affidavits so Dalton and I can have them signed in December.
M. Bray	12/18/2024	0.5	0.5	Reviewed the motion to stay and our opposition to stay at the 5th Cir for DWCC. Will file in the morning.
M. Bray	12/19/2024	0.9	0.9	Finalized and filed our opposition for motion to stay at 5th Circuit for DWCC
M. Bray	12/24/2024	0.7	0.7	Reviewing draft surreply for briefing on a stay with the 5th circuit for DWCC. Received an email from Rob, replied to Rob and Dalton. We aren't going to file.
M. Bray	12/24/2024	0.8	0.8	Reviewing mass mailing letter, emailed my revisions back to Plum and Dalton in the event it has not gone out yet
M. Bray	01/14/2025	1	1	Meeting to discuss prep for status conference in the morning for DWCC
M. Bray	01/14/2025	0.6		Preparing documents to review before status conference tomorrow for DWCC
M. Bray	01/14/2025	2	1	Reviewing documents to prepare for status conference in the morning for DWCC [time reduced by 50%]
M. Bray	01/15/2025	0.7	0.7	Preparing for Zoom status conference with Judge Foote for DWCC
M. Bray	01/15/2025	1	1	Status Conference with Judge Foote via Zoom for DWCC and debrief with the team afterward.
M. Bray	03/06/2025	0.5	0.5	Met with Plum about a few DWCC related matters
M. Bray	03/13/2025	0.3	0	Received the link to the Dropbox files for Carlton Turner to be sent to his attorney, Justin Harrell. Prepared the folder to send the link, created a transfer link with a password, and emailed all to Mr. Harrell
M. Bray	03/18/2025	0.2	0	Call with Dalton re. planning a trip to DWCC to visit prisoners at the end of March
M. Bray	03/18/2025	0.2	0	Call with Plum re. a visit to DWCC. She will begin making a list of people we need to speak with.
M. Bray	03/27/2025	1.7	1.7	Calls with 4 people at DWCC. All notes are in a Google Doc.
M. Bray	03/27/2025	0.5	0.5	Fleshed out a few of my notes from the DWCC calls this morning, shared the Google Doc with Dalton and Plum so they have the notes from my calls.
M. Bray	04/23/2025	0.5	0.5	Met with Dalton to discuss strategy before the status conference with Judge Foote at 9:00 for DWCC

Staff	Date	Time Worked	Time Requested	Activity
M. Bray	04/23/2025	0.5	0.5	Status conference with Judge Foote re. DWCC
M. Bray	04/23/2025	0.6	0.6	Debrief with Dalton and Plum following the status conference. Discussed the next steps for us to prepare the proposed scheduling order that is due June 6.
M. Bray	05/07/2025	0.9	0.9	Returned a call to Eva Smith re. her brother David Smith at DWCC. Discussed the lawsuit, his situation, and what the family can do to best support him.
M. Bray	05/07/2025	0.3	0.3	Call with Hannah at LCCR re. a client she has that's housed at DWCC. Discussed his situation and brainstormed some possible options to explore to either get him placed in another DOC facility or at least begin to document a need for transfer. She will send his name and DOC so we can have contact with him as well.
M. Bray	05/09/2025	0.9	0.9	Met with Dalton and Plum to discuss DWCC, the scheduling order, and what we need to do to prepare
M. Bray	05/09/2025	1.3	1.3	Met with Dalton and Plum to discuss DWCC, the scheduling order, and what we need to do to prepare
M. Bray	05/09/2025	0.5	0.5	Exchanging emails with Katie and Michael Bien re. the attorney fees for DWCC. We will have a meeting on Monday afternoon to discuss
M. Bray	05/12/2025	1	1	Call with Mike Bien, Katie and Dalton re. representation on attorney fees for DWCC
M. Bray	05/19/2025	0.5	0.5	Call with Rob Cobbs and Dalton to update Rob about the status of DWCC
M. Bray	05/20/2025	0.7	0.7	Discussion with Dalton and Katie re. hiring outside counsel to represent us on the fee and cost motion for DWCC. We will decline Bien's offer and reach out to John Adcock.
M. Bray	05/22/2025	1	1	Call with Mike Bien re. fee representation for DWCC
M. Bray	05/22/2025	0.2	0	<del>Call with Katie to follow up after my call with Mike re. fee representation for DWCC</del>
M. Bray	05/27/2025	0.1	0.1	Touched base with Dalton, Judge Foote invited Plaintiffs to respond to Defendants' renewed motion to stay due 5/30
M. Bray	05/28/2025	0.4	0.4	Meet with Dalton to discuss DWCC and the opposition to Def motion to stay
M. Bray	05/29/2025	0.3	0.3	Touched base with Dalton re. DWCC; Defendants filed a letter with the Fifth Circuit yesterday. Dalton started a draft response, Rob Cobbs is revising it.
M. Bray	05/29/2025	0.5	0.25	Reviewed and revised the response letter for the 5th Circuit for DWCC. Sent a message to Dalton to let him know I'll put it on letterhead and file in the morning if he has no further revisions [time reduced by]
M. Bray	05/30/2025	0.6	0	<del>Finalized opposition to motion to stay for DWCC and filed in WDLA. Emailed courtesy copy to Judge Foote.</del>
M. Bray	05/30/2025	1.2	1.2	Reviewing and revising the letter for DWCC to file with the Fifth Circuit in response to the letter filed by Defendants
M. Bray	05/30/2025	0.9	0.9	Finalized letter for DWCC at the Fifth Circuit in response to Defendants' letter. Filed with the Fifth Circuit.
M. Bray	05/30/2025	2.7	2.7	Reviewing and revising the letter for DWCC to file with the Fifth Circuit in response to the letter filed by Defendants. Discussed with Dalton.
M. Bray	06/03/2025	0.6	0.3	<del>Drafting proposed scheduling order for DWCC [time reduced by 50%]</del>
M. Bray	06/03/2025	0.5	0.5	<del>Drafting proposed scheduling order for DWCC</del>
M. Bray	06/03/2025	0.5	0	<del>Revised the engagement letter with John Adcock for representation with DWCC attorney fees and costs, emailed to Ranie for her review. Emailed the revisions back to John to make sure I didn't alter the intent of the letter. If it's good, we'll sign off.</del>
M. Bray	06/04/2025	1.2	0.6	Met with Dalton and Plum; discussed DWCC and the proposed scheduling order. I will email John re. the engagement, MJC and PJI about the fees and costs [time reduced by 50%]
M. Bray	06/04/2025	0.1	0	<del>Emailed John Adcock re. the engagement letter, we will sign and return to him later today after we touch base with the other attorneys</del>
M. Bray	06/05/2025	0.5	0.25	<del>Reviewing and revising the proposed scheduling order for DWCC. [time reduced by 50%]</del>
M. Bray	06/05/2025	0.5	0.5	<del>Drafted Motion to Withdraw and proposed order for Nora Ahmed. Emailed to her for review before I file.</del>
M. Bray	06/05/2025	0.2	0	<del>Had a brief call with John Adcock re. what files he needs for DWCC. Shared the ECF folder for now, will revisit his file access in the future if he needs more.</del>
M. Bray	06/05/2025	0.5	0.25	<del>Drafted Motion to Enroll John Adcock for the purposes of fees and costs. Emailed to John and Dalton for review before I file today. [time reduced by 50%]</del>
M. Bray	06/05/2025	0.3	0	<del>Received a response from Nora re. the motion to withdraw. Filed with WDLA. Downloaded and saved the ECF to the folder</del>
M. Bray	06/05/2025	0.4	0	<del>Reviewing and revising proposed scheduling order for DWCC.</del>
M. Bray	06/06/2025	6	6	Finalizing proposed scheduling order for DWCC. Finalizing motion for visit to DWCC. Filed proposed order. Emailed motion for site visit to opposing counsel for their review so we can file Monday.
M. Bray	06/09/2025	0.4	0.4	Drafted a response to Keith re. DWCC, sent to Dalton for his review and consideration before I send it to him.
M. Bray	06/09/2025	0.6	0.6	Discussed with Dalton the response to Keith's email regarding consent to our motion. Sent the email to Keith. I will file the
M. Bray	06/09/2025	0.8	0.8	Updated the motion and MISO for the cell front visits and walkthrough to reflect we sought consent and didn't get an
M. Bray	06/10/2025	0.2	0.2	Replied to an email chain with John and Dalton re. DWCC and confidentiality
M. Bray	06/10/2025	0.4	0.4	Replied to an email chain with John and Dalton re. DWCC in response to questions John has
M. Bray	06/13/2025	0.1	0.1	Responded to an email from Andrew Blanchfield re. my request for consent for the amended class notice.
M. Bray	06/15/2025	1	1	Pulled time records report from 8/16/2024 to 6/15/2025 for DWCC. Sorted and organized the Excel spreadsheet, emailed to
M. Bray	06/16/2025	0.5	0.5	Meeting with John Adcock and Dalton re. DWCC and fees
M. Bray	06/16/2025	0.1	0.1	Responded to emails from John re. DWCC
M. Bray	06/24/2025	0.5	0.5	Reviewing emails re. time records and costs for DWCC from John to our co-counsel
M. Bray	06/24/2025	3.8	3.8	Pulled updated time records for me for DWCC time for last week to update the spreadsheet. Reviewing Plum's time against
		73.7	64.55	<b>TOTAL HOURS</b>

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	08/19/2024	2.2	1.6	<p>Reviewing motions for costs and fees as well as supporting exhibits; reviewing special master proposal and CVs; email to Ms. Bray and Mr. Courson re: possibly-mislabelled document (.8)</p> <p>Scanning and saving envelopes returned as undeliverable from mass mailing (.2)</p> <p><del>Conferring with Mr. Courson regarding timelines, fees motion, and notice to class members (.6)</del></p> <p>Opening, scanning, and saving new letters, including one with bulky enclosure (.6)</p>
P. Birk	08/20/2024	0.4	0	<del>Renaming scans of letters that I scanned at the end of the day yesterday, formatting pdfs to combine multiple scans for one bulky letter into one pdf, quick review of same (.4)</del>
P. Birk	08/21/2024	7.5	6.3	<p>Checking funds in Endicia online account; drafting and sending email to Finance requesting the addition of funds for the purpose of a DWCC update mass mailing (.2)</p> <p>Generating list of letters returned from the mass mailing on an Excel sheet for re-mailing (.2)</p> <p>Looking up locations on VineLink and calling local facilities to try to determine current housing locations for folks whose letters came back to us (includes hold and transfer times on the phone) (.9)</p> <p>Printing cover letters and new address labels; stamping, stuffing, and sealing new envelopes; scanning and delivering to Front Desk for mailing (.6)</p> <p>Opening, scanning, and saving new letters (.2)</p> <p>Conferring with Ms. Bray re: recent communication with class members / class member families and re: recent communication with and request from A&amp;R law firm (.3)</p> <p>Opening, scanning, and saving additional letter forwarded by MacArthur (.2)</p> <p><del>Bopping around the office searching for an adequate number of envelopes for upcoming update mass mailing (.4)</del></p> <p>Gathering sheets for printing stamps for mass mailing (.2)</p> <p><del>Trying to print stamps for mass mailing; testing 3 different printers; troubleshooting printer connection; call to Endicia help desk; further troubleshooting with Endicia associate (.8)</del></p> <p>Printing stamps for mass mailing (.3)</p> <p>Applying ink stamps (legal and confidential) to front and back of about half of the envelopes; applying postage stamps to approximately 1/4 of the envelopes (3.2)</p>
P. Birk	08/23/2024	2.9	2.9	<p>Opening, scanning, and saving new letters (.2)</p> <p>Reviewing assistance request from Mr. Kauffman regarding an individual incarcerated in Louisiana; forwarding email to Ms. Bray with request for guidance (.2)</p> <p>Reading The State's Combined Reply in Support of Its Motion to Stay Pending Appeal and Opposition to Plaintiffs' Cross-Motion (.3)</p> <p>Reading over emails regarding Def's opposition; reading Mr. Cobbs' draft potential response notes (.3)</p> <p>Drafting and sending email response to Mr. Kauffman in regards to the assistance request that came in through him (.2)</p> <p>Beginning the process of going through old correspondence with one DWCC writer and generating memo to share with A&amp;R law firm on request (.9)</p> <p>Searching through transcripts from both the liability and remedy phases to pull out Mr. Haney and Mr. Pacholke's testimonies (.8)</p>
P. Birk	08/26/2024	3.7	2.1	<p><del>Continuing process of going through prior correspondence with gentleman from request from A&amp;R law firm; pulling info from letters into a memo; verifying housing location online; emailing memo to Ms. Bray to forward the information to A&amp;R (1.6)</del></p> <p>Generating new folders and organizing DWCC files in my personal DWCC DropBox folder (.4)</p> <p>Quick-reviewing (not memo'ing) letters in DWCC intake folder in order of most recently received to oldest in order to identify gentlemen who have written recently to schedule for attorney phone calls; updating the recommended calls spreadsheet to reflect same; email to Ms. Bray re: same (1.3)</p> <p>Reading over motion, brief, proposed order, and proposed notice to the class regarding notice of filing for attorneys fees (.4)</p>

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	08/27/2024	5	4.5	<p>I joined Ms. Bray for a scheduled attorney Zoom call with CB; we joined the Zoom and stayed on for 30 minutes; however, CB never joined the call (.5)</p> <p>Scanning and saving envelope returned as undeliverable (.1)</p> <p>Looking at prior correspondence from gentlemen housed at Hunt and beginning to pull together a list for Ms. Bray of folks we need to visit (.3)</p> <p>Reviewing voicemail and calling back to Raymond Laborde to verify recent legal mail, including transfer and hold time (.2)</p> <p>Reviewing voicemails and responding to Intake and Reception regarding callbacks to DWCC loved ones and class members (.3)</p> <p>Generating index for binders for the Court; printing Rec. Doc. 790 and all attachments and exhibits; creating labels; troubleshooting labels; sourcing binders and hole punched paper; troubleshooting printer; putting binders together; checking for completeness; creating cover sheet; delivering to Mr. Courson / Ms. Bray for taking to FedEx (2.8)</p> <p>Sifting through dropbox folder and recent letters to identify folks we need to see soon; generating list of suggestions for scheduling visits and sending to Ms. Bray (.6)</p> <p>Two attempts to call back to Mr. SY, who was previously housed at DWCC (.2)</p>
P. Birk	09/03/2024	3.3	3.3	<p>Checking in with Ms. Bray re: general DWCC inmate calls last week as well as specific call to CB (.3)</p> <p>Scanning letters returned as undeliverable (.1)</p> <p>Opening, scanning, and sorting all prison letters received in the last week (1.3)</p> <p>Attempted call to EHCC mail room; it rang for 2 minutes but no one answered and it never went to a voicemail box (.1)</p> <p>Reading over Def's motion and MISO motion to stay re: attorneys' fees (.4)</p> <p>Second attempted call to</p>
P. Birk	09/05/2024	2.2	2.2	<p>Call to Ms. Dumas in EHCC mail room to verify some legal mail; she took my name and extension and stated she would need to call me back later (.1)</p> <p>Updating recommended calls list on DWCC spreadsheet to reflect men whose info I sent to Mr. Courson on Tuesday as well as recent call that came in through Ms. Schwartzmann (.3)</p> <p>Generating memos from Ms. Bray's call notes from attorney calls to DWCC last week; making notes regarding action to take in response to those calls; emails back and forth to Mr. Andreson to discuss connecting one gentleman to FAIR; creating folders in DropBox for writers who are new to us; moving call memos into individual folders (.6)</p> <p>Updating list of folks who have requested to be sent the full Remedy phase decision; looking back over recent memos to ensure I didn't miss anyone (.4)</p> <p>Organizing physical letters in DWCC closet to assess need for space and more folders (.8)</p>
P. Birk	09/06/2024	2.4	2.4	<p>Scanning and saving envelope of letter returned as undeliverable (.1)</p> <p>Opening, scanning, and saving new letters (.2)</p> <p>Attempted call to EHCC mail room to verify legal mail; it rang for 2 minutes, but no one answered and it never went to a voicemail box (.1)</p> <p>Reading over the Court's order denying def's motion to stay pla's motion for attorneys fees and costs (.1)</p> <p>Reading over letter that was sent to the press re: hunger strike on N4 at DWCC; reviewing recent letters from that tier to compare handwriting; identifying writer (.2)</p> <p>Organization of physical letters in personal office and relocating older ones to the DWCC closet (.2)</p> <p>Attempted another call to EHCC mail room (.1)</p> <p>Reading over new DPS&amp;C audit report circulated by Mr. Kauffman (.3)</p> <p>Research online to learn more about Prison Enterprises and their interaction with the state prisons and specifically DWCC (.3)</p> <p>Made yet another attempted call to EHCC mail room to verify legal mail; it is my suspicion that they don't staff the mail room on Fridays, or someone is out today (.1)</p> <p>Opening and scanning new letters (.3)</p> <p>Organizing physical letters in office and relocating ones that have been sent responses to DWCC closet (.4)</p>

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	09/10/2024	1.1	1.1	Reviewing two recent letters from class member CR and adding him to recommended calls list on Googlesheet; email to Ms. Bray re: same (.6) Verifying legal mail with LSP from mass mailing letter that apparently arrived much later than the others (.2) Opening, scanning, and saving new letters (.3)
P. Birk	09/16/2024	0.7	0.7	Reviewing Mr. Courson's notes on his most recent set of attorney phone calls to DWCC; generating separate call memos for each gentleman and adding them to their individual folders in DropBox; looking up info regarding two individuals mentioned by one of the men during the call and adding that info to call tracking spreadsheet (.7)
P. Birk	09/17/2024	3.2	2.9	Opening, scanning, and saving all letters received in the last week, including a couple of bulky ones (.8) <del>Conferning with Ms. Bray re: letters and calls for this week (.3)</del> Updating recommended calls spreadsheet with information about new gentleman; locating that gentleman's DoC number online; adding info on letter from other gentleman whose mother recently reached out; emailing Ms. Bray and Mr. Courson to provide them a scan of one follow-up letter (.4) Reviewing past correspondence with one individual at DWCC to determine what our most recent talks with him have been in regards to (.3) Reviewing past correspondence with and references to other gentleman who was listed in one recent letter; updating spreadsheet with his info; email to Ms. Bray re: same (.4)
P. Birk	09/18/2024	0.8	0	<del>Relocating all Liability and Remedy phase transcripts from personal attorney offices to main DWCC storage closet for organizing on Friday (.8)</del>
P. Birk	09/19/2024	1.6	1.6	Reviewing Ms. Bray's DWCC call notes from today and flagging action / research items for myself (.4) Research online to try to determine what the law says about language interpreters in Louisiana prisons obo gentleman mentioned on call today and to try to locate resources in Spanish we might be able to offer him (.6) Looking up other items mentioned on calls today and adding comments to notes document; updating personal to-do lists to reflect other items from call notes (.3) Working on letters in weekly intake folder (.3)
P. Birk	09/20/2024	3.9	3.9	Opening, scanning, and saving new letters (.2) Looking up locations for men whose letters have come back the last couple of weeks as undeliverable; generating re-sending cover letters and labels; updating mass mail spreadsheet; re-printing letter for the gentleman whose letter was left in our mailbox and got damaged by rain during the hurricane; prepping and scanning envelopes for re-sending (.7) Sourcing large labels and inventorying large expandy envelopes; generating large labels for 12 men to whom we are sending the full Remedy decision and remedial orders; printing labels; printing press release, remedial orders, and full decision x12, including troubleshooting printer; stuffing and prepping envelopes; sealing and scanning envelopes (2.5) Carrying envelopes for sending out copies of full decision to the Post Office and waiting while they each had postage labels printed and attached (.5)
P. Birk	09/23/2024	3	3	Verifying legal correspondence sent Friday with LSP (large envelopes with copies of full Remedy decision) (.2) Printing new letter scan cover sheets (.1) Opening, scanning, and saving new letters (.3) Generating call memos regarding attorney calls placed on 9/19/24 based on call notes created by Ms. Bray; troubleshooting minor issue wth naming conventions in dropbox (.7) Organizing files in dropbox based on housing location updates (.7) Organizing physical letters in DWCC closet (1.0)
P. Birk	09/24/2024	2.9	2.9	Opening, scanning, and saving new letters (.3) First attempt at calling pen pal who left a message regarding DWCC writer; left voicemail with my extension (.1) DWCC pen pal called back and we spoke on behalf of his friend at DWCC (.5) Briefly reviewing letters that have been received recently and updating recommended calls list on DWCC tracking spreadsheet (.8) Organizing files in DWCC file closet (1.2)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	09/25/2024	1.5	1.5	Call to DWCC mail room to confirm legal mail that we sent last week, including transfers and hold times (see notes on DWCC Mail Room Call Tracking spreadsheet) (.4) Returning call from social worker at EHCC on behalf of client with significant mental illness who will be releasing soon (.4) Typing up memo from handwritten call notes (.3) Filling out FAIR referral form on behalf of said client and delivering to Mr. Andreson (.2) Opening, scanning, and saving new letters (.2)
P. Birk	09/26/2024	3.4	3.4	Organizing and updating callback list and DWCC to-do list (.3) Online research to locate referrals for deaf individual in custody (.6) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.5)
P. Birk	09/27/2024	0.3	0	Reading over and analyzing def's motion for clarification from the Court regarding it's recent order (.3)
P. Birk	10/01/2024	0.6	0.6	Checking over recommended calls spreadsheet to ensure there are 3 men listed for calls this week (.1) Looking back at previous correspondence between us and one writer to add context to his more recent letters (.3) Received email from Mr. Courson requesting info on whom to schedule for calls this week; responding to same (.2)
P. Birk	10/02/2024	1.9	1.9	Opening, scanning, and saving new letters (.3) Received a voicemail forwarded by Reception from Ms. Dumas at Elayn Hunt, calling to confirm legal mail; I attempted to call her back; the phone rang for a full minute but no one answered and it did not offer the option to leave a voicemail (.1) Second attempted call to EHCC mail room - this time a receptionist answered and transferred me, but again it rang and rang and never answered (.1) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.4)
P. Birk	10/03/2024	2	2	Called EHCC again to try to confirm legal mail with Ms. Dumas who left us a message on DRLA's main phone line; the woman who answered acted at first like she did not know who Ms. Dumas is. I said I thought it was to verify legal mail, and she said "I don't know." So I asked to speak to the mail room, and she said the phone in there is broken. She asked someone else if the phone in the mail room is still broken, told me to hold on, and apparently set down the phone. After 7 minutes, she came back and answered the phone as though I was a new call. I told her I was still the same person, on hold, waiting to speak to Ms. Dumas. Without saying anything further, she transferred me to some line that just kept ringing and ringing until I hung up. (.2) Organizing files in DWCC closet (1.8)
P. Birk	10/03/2024	3.6	3.6	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.2) Generating outgoing response letters from template; updating one response I wrote a few weeks ago to reflect new information so letters are ready to print and mail today (.4)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	10/04/2024	4.1	4.1	<p>Tried again to return the voicemail from EHCC to confirm legal mail sent to class members; the man who answered didn't know of a Ms. Dumas so he transferred me to Ms. Dennis, who said she was not the one who left us a voicemail; she said Ms. Dumas had already left for the day (.2 including hold time)</p> <p>Assessing letter that was returned to us as undeliverable from last mass mailing; reviewing past correspondence in that gentleman's file; locating his phone number; left him a voicemail letting him know I had tried to send a letter and want to verify his address - provided my direct extension in case he calls back (.3)</p> <p>Drafting follow-up letter to one individual from recent attorney calls to DWCC (.6)</p> <p>Printing response letters for mailing today; generating and printing labels; locating my postage stamps and borrowing "legal" stamps in the front office; prepping and stuffing envelopes; scanning envelopes and leaving in mail tray in front office; sending an email to Mr. Carter to let him know my letters need to go out today, since it is my understanding that he covers mail for the Front Desk when Reception is out (.6)</p> <p>Gentleman I left a voicemail for called back; we spoke and I gathered his new mailing address to forward the update letter to him (.4)</p> <p>Upon request from Mr. Carter, I went back and filled out a mail request form for the letters I need him to take to the post office today (.1)</p> <p>Called and spoke to a class member who was formerly at DWCC and is now out of custody; he had gotten our mass mailing update letter and was calling with some questions about the case (.4)</p> <p>Preparing and submitting expense report from taking copies of full remedy decision to the post office for mailing last week (.3)</p> <p>Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.2)</p>
P. Birk	10/07/2024	4.3	4.3	Reviewing all items in DropBox that came up with a search of the name of the class member who contacted us regarding copies of his medical and mental health records; reviewing items and generating a memo summarizing what is available from what time periods; emailing memo to Ms. Bray for review (4.3)
P. Birk	10/08/2024	1.1	1.1	<p>Confirming legal mail sent last week with M/Sgt. Lartigue at LSP (.2)</p> <p>Attempting callbacks to 3 different people who have called lately on behalf of loved ones who are class members; left voicemails for all 3 (.3)</p> <p>Conferring with Ms. Bray regarding recent writers and concerns from letters and calls; discussing scheduling calls for this week to DWCC (.3)</p> <p>Brief review of letters that came in today and adding recommended calls to the tracking spreadsheet (.3)</p>
P. Birk	10/09/2024	2	2	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.0)
P. Birk	10/10/2024	2.8	2.8	<p>Call to sister of class member who is now housed at LSP to return her voicemail (.5)</p> <p>Opening, scanning, and saving new letter (.1)</p> <p>Typing up memos from handwritten call notes taken during recent calls with class members' loved ones and adding memos to individual files in DropBox; generating new DropBox folders where needed (1.7)</p> <p>Organizing files in DropBox folders (.5)</p>
P. Birk	10/11/2024	0.8	0.8	<p>Briefly meeting with Ms. Bray regarding the writer who sent a letter in Spanish (.2)</p> <p>Drafting contact letter for class member we have not heard from in a while; printing letter and label; stamping envelope; scanning outgoing envelope and delivering to Front Desk for hopeful mailing today (.6)</p>
P. Birk	10/15/2024	3.3	3.3	<p>Reviewing, memo'ing, and drafting responses to letters in weekly intake folder prior to leaving for my medical appointment (1.3)</p> <p>Reviewing, memo'ing, and drafting responses to letters in weekly intake folder after returning from my medical appointment (2.0)</p>
P. Birk	10/16/2024	1.2	1.2	<p>Opening and scanning all new letters, including a couple of rather bulky ones and one that required extra manipulation because the envelope was stapled through and the pages were strangely glued together at the top of the page (.4)</p> <p>Organizing physical files in DWCC file closet (.8)</p>
P. Birk	10/17/2024	5.5	5.5	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.5)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	10/18/2024	3	3	Opening, scanning, and saving new letters (.4) Generating outgoing response letters from memos and template; printing; creating address labels; printing; printing enclosures; prepping envelopes with ink and postage stamps; stuffing and sealing; scanning outgoing envelopes; filling out mail request form for someone to take my letters to the post office since the Receptionist isn't here today; email to Mr. Carter to let him know I have mail that needs to go out (1.4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.2)
P. Birk	10/21/2024	4.9	4.9	Moving items out of weekly intake folder and into individual complainants' folders; generating new folders for new writers; moving folders based on current housing; editing file names to remove leading numbers (.4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (4.5)
P. Birk	10/22/2024	3.7	3.7	Opening, scanning, and saving new DoC letters (.4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.3)
P. Birk	10/23/2024	2.6	2.6	Confirming recently-sent legal mail with LSP (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder; looking up referral info and resources online (2.4)
P. Birk	10/24/2024	5	5	Verifying legal mail with two different prisons on behalf of class members, including hold time (.4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder, including several very lengthy ones (4.6)
P. Birk	10/25/2024	2.6	2.6	Generating outgoing response letters from template; printing letters; generating address labels; printing labels; adding postage stamps, labels, and ink stamps to envelopes; printing enclosures; stuffing and sealing envelopes; scanning outgoing envelopes; delivering to Front Desk for hopeful mailing today (2.4) Opening, scanning, and saving new letters (.2)
P. Birk	10/28/2024	4.5	4.5	Verifying last week's Legal mail to class members with mail room at LSP (.2) Moving items out of weekly intake folder and into individual complainants' folders on DropBox; generating new folders where needed; editing file names to remove leading numbers; updating mass mail list to reflect new writers (.6) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.7)
P. Birk	10/29/2024	3.3	3.3	Received letter returned as undeliverable; scanned and saved to returned letters folder; looked up the class member's status online; checked past correspondence for addresses; confirmed he has been released from custody; updated the mass mailing spreadsheet to reflect his status; updating the location of his individual folder in DropBox (.3) Drafting letter to class member's loved one whom I spoke to a few weeks ago; memo'ing our call; printing resources for her; generating DropBox individual folder for her loved one (.8) Generated and printed cover letter for re-sending mass mailing update letter to class member now living in Texas; generated a memo from my handwritten notes from our recent call; prepped the envelope for the letter to go out again (.6) Moving files from weekly intake folder into individual complainants' folders; generating new folders where needed; moving files based on changes in housing locations (.3) Reviewing voicemail and calling up to RLCC to confirm legal mail sent last week to a class member who is now being housed there (including hold time) (.2) Scanning and saving new letters (.2) Typing up memos from a few other recent calls from handwritten notes and adding to individual class members' files (.9)
P. Birk	10/30/2024	3.2	0	Pulling all DWCC deposition transcripts from 2019-2022 out of the closet, organizing into chronological order, and stacking onto shelves above the Legal team supplies in order with notes to assist with label making (2.4) Organizing physical letters in DWCC files closet and gathering folders for getting more of them into the file cabinets (.8)
P. Birk	10/31/2024	3.2	3.2	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.2)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	11/01/2024	3.2	3.2	Generating outgoing response letters from template; generating address labels; printing letters and labels; stamping envelopes and applying address labels and postage; stuffing, sealing, and scanning outgoing envelopes; delivering to front desk for hopeful mailing today; emailing the head of Administration to let him know I need the letters to go out since Reception is not here today (.8) Updating Louisiana prison concerns spreadsheet to reflect information sent from class members who have been transferred to Allen CC (.3) Moving letters out of weekly intake folder and into individual complainants' files; generating new files where needed; moving files into other folders to reflect housing changes; updating leading numbers on items still in weekly intake folder (.9) Organizing physical letters in DWCC files closet (1.0) Opening, scanning, and saving new letter; checking on VineLink to ensure I was interpreting the gentleman's handwriting correctly for his name spelling (.2)
P. Birk	11/06/2024	1.4	1.4	Received voicemail forwarded from Ms. Bray's line and another from the Front Desk, regarding class member who is currently being housed at Hunt; called back to speak to the loved one who left the first voicemail; sent quick follow-up email to Ms. Bray to let her know the situation sounds urgent (.4) Comparing calendars to try to determine when we may be able to visit class member who is currently at Hunt (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (.8)
P. Birk	11/07/2024	1.3	1.3	Meeting with Ms. Bray regarding correspondence with class members and planning a visit soon, etc. (.7) Checking VineLink to determine the current housing location of class member whose letter was returned as undeliverable; updating mass mailing active spreadsheet to reflect current location; moving file in DropBox to reflect current location; checking past correspondence to see if we have other addresses for him (.3) Opening, scanning, and saving new letters; scanning envelope returned as undeliverable; analyzing one letter to determine if it should be a regular intake (.3)
P. Birk	11/09/2024	1.8	1.8	Generating memos from Mr. Courson's handwritten call notes to class members last week (.8) Going back over memos from attorney calls placed this year and generating list of recommendations for class members who can provide affidavits (1.0)
P. Birk	11/12/2024	3.6	0	<del>Pulling up GoogleDocs for all DWCC attorney calls placed since last autumn; reviewing and analyzing all call notes; reviewing correspondence with same gentlemen; documenting synopses of our interactions with each gentleman; identifying recommendations for whom to seek follow up; emailing my memo to Ms. Bray and Mr. Courson for them to slim down based on their call observations (3.6)</del>
P. Birk	11/13/2024	0.3	0	<del>Opening, scanning, and saving new letters (.2) Updating to do list and determining priorities for class member contact tomorrow (.1)</del>
P. Birk	11/15/2024	2.5	2.5	Opening, scanning, and saving new letters (.3) Minor tidying of physical letters in personal office (.2) Working on organization of class member letters in DWCC files closet (1.0) Reviewing, memo'ing, and responding to letters in weekly intake folder (1.0)
P. Birk	11/18/2024	0.8	0	<del>Moving items into appropriate folders based on housing changes (.3) Reviewing, memo'ing, and drafting response to one letter in the weekly intake folder (.5)</del>
P. Birk	11/19/2024	1.5	1.5	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.5)
P. Birk	11/21/2024	5.4	5.4	Opening, scanning, and saving new letters (.2) Generating memos from handwritten call notes taken during calls with class member family and friends over the last few months (which I have been behind on memo'ing), and saving to individual files; drafting follow-up letters to class members and loved ones I have spoken to recently who were awaiting follow-up; locating and printing enclosures for those to whom we are sending informational flyers and copies of the Remedial Order, etc; prepping outgoing mail for follow-up letters (4.2) Drafting follow-up letters to two class members who recently had attorney phone calls, to re-establish contact and to ensure they have our mailing address; printing letters as well as enclosures with ARP / Medical info with the plan to mail tomorrow (1.0)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	11/22/2024	0.8	0	Prepping envelopes for response letters going out today; scanning outgoing envelopes; filling out mail request forms; emailing Mr. Carter to let him know the items are in the Front Office for him to mail since the Receptionist is at home (.3) Organizing physical letters in DWCC files closet (.5)
P. Birk	11/25/2024	2.4	2.4	Reading over 5th circuit scheduling order; checking rules online to confirm our interpretation of the timeline for our reply brief in relation to the appellants' brief (.4) Call with class member's mother (.4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.6)
P. Birk	11/26/2024	2.9	2.9	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.9)
P. Birk	11/27/2024	2	2	Opening, scanning, and saving new letters from class members (.3) Organizing physical letters in DWCC files closet (1.1) Reviewing, memo'ing, and responding to letters in weekly intake folder (.6)
P. Birk	12/03/2024	2.2	2.2	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.2)
P. Birk	12/04/2024	1	0	Opening, scanning, and saving new prison letters (.3) Brief organization of letters in David Wade files closet (.7)
P. Birk	12/05/2024	1.1	0	Organizing letters in DWCC files closet (1.1)
P. Birk	12/06/2024	1.4	1.4	Organizing files in DWCC dropbox to reflect current housing locations (.4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.0)
P. Birk	12/10/2024	2.6	2.6	Conferring with Ms. Bray re: status of class member communications, recommended calls to place this week, and sending out an end-of-year mass mailing (.4) Call with class member's mother regarding concerns in P2 (.3) Reviewing past correspondence from/to class member whose mother called today (.2) Opening, scanning, and saving new letters (.2) Reviewing recent correspondence to determine class members to call this week; updating tracking spreadsheet with recommendations; email to Mr. Courson to let him know who is on the list (.6) Organizing physical letters in my office (.3) Organizing files in DropBox to reflect updated housing locations (.6)
P. Birk	12/11/2024	3.2	3.2	Reviewing and considering email from class member's loved one that was sent to Ms. Bray; drafting response; locating attachment to provide information on the ARP process; finalizing and sending email (.8) Organizing physical letters in DWCC file closet and in my personal office (2.0) Reviewing communication with class member's attorney; reviewing correspondence to ensure we have permission to share records with the attorney; reviewing my memo on the records so I can begin pulling them together tomorrow (.4)
P. Birk	12/12/2024	3.5	3.5	Starting process of compiling records we have for one class member into a combined folder that we can share with his attorney (.5) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.0)
P. Birk	12/16/2024	2.4	2.4	Research online to determine fonts and style requirements for the 5th circuit (.3) Working on cover page and formatting of opposition document for Mr. Courson (1.7) Cite checking opposition document (.4)
P. Birk	12/17/2024	3.2	3.2	Finalizing formatting of draft of opposition to motion to stay, and emailing to Ms. Bray and Mr. Courson to finalize and file (.4) Opening, scanning, and saving new letters (.2) Typing up memos of attorney calls to class members from handwritten call notes (.7) Organizing physical letters in DWCC closet until I couldn't handle the smell coming from the walls anymore (1.4) Initial call with class member's wife to return her call to us at the end of last week; after we spoke for a few moments, she said she was leaving work and asked that I call back in about 20 minutes (.2) Follow up call with class member's wife; made plans to send her some information in the mail tomorrow (.3)
P. Birk	12/18/2024	1.3	0.65	Opening, scanning, and saving new prison letters (.2) Organizing letters in DWCC files closet and sourcing more folders (.8) Looking over minute entry from Judge Foote setting a status conference; discussing with Ms. Bray; adding to DWCC calendar (.3). [total time reduced by 50%]
P. Birk	12/19/2024	2.3	2.3	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.3)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	12/20/2024	4.4	4.4	Organizing files in DropBox folders and beginning update of current housing locations spreadsheet (2.1) Generating first draft of end-of-year mass mail update letter to inform class members about the status of the case and generally touch base (1.8) Reading over the State's motion for an extension and reply memo re motion to stay (.5)
P. Birk	12/23/2024	5.6	5.6	Creating a template letter for responding to class members who write about denial or restriction of medical care; sending same to Ms. Sanchez (1.3) I performed a proofread of Mr. Courson's draft of a sur-reply for the 5th Circuit; however, after completing it, I determined it made more sense to wait for a more complete version with Ms. Bray's edits to offer any proofreading corrections, so as to avoid having too many versions of the document (.6) Sourcing envelopes and printing stamps; refilling ink stamps to prep for envelope-stamping; beginning process of applying postage and ink stamps to envelopes for upcoming mass mailing (3.3) Beginning to verify / update current housing locations on mass mailing address list (.4)
P. Birk	12/27/2024	6.1	6.1	Reviewing version of mass update letter draft that includes Ms. Bray's revisions; minor typo corrections; saving to appropriate location on DropBox (.3) Continuing to try to verify housing locations online until the website kicked me out again (2.6) Finishing applying "legal" stamps, "confidential" stamps, and postage stamps to all envelopes needed for mass mailing (3.2)
P. Birk	12/30/2024	10.8	10.8	Organizing physical letters in DWCC files closet (1.5) Finishing verifying and updating current housing locations on mass mailing list; the process took significantly longer than usual, as the website would not allow me to search while signed into our account; I had to complete captcha puzzles, between 1 and 6 for each individual whom I searched for, before it would allow the search to go through (4.3) I came back to the office after-hours to complete the mass mailing - arrived just before 7:00 and left just after midnight; I finalized the mailing list, printed address labels, struggled with the mail merge settings but ultimately printed the letters, attached the labels to the envelopes, folded the letters and stuffed them in the envelopes, and moistened and sealed the envelopes; I left them in the Front Desk with a mail request form and also sent an email to Mr. Carter with instructions for them to go out on 12/31/24 (5.0)
P. Birk	12/31/2024	0.3	0	Opening, scanning, and saving new prison letters; moving items in DropBox to appropriate locations (.3)
P. Birk	01/02/2025	6.2	6.2	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (6.2)
P. Birk	01/03/2025	2.6	2.6	I needed stamps for sending mail to class members, and the Receptionist was not in the office; I logged into Endicia to print a sheet for myself; I was not immediately able to use my own printer and spent time troubleshooting the printer in the work room next to the elevator; I ultimately gave up on that and went back to troubleshooting the website itself; I was finally able to print a sheet of stamps on my own printer (.7) Checking housing locations of folks who were being sent response letters today; updating one letter to reflect housing change (.3) Generating outgoing response letters from template (.6) Generating and printing address labels (.2) Printing letters and attachments (.2) Prepping envelopes with address labels, postage stamps, and ink stamps; stuffing envelopes with letters; moistening and sealing envelopes; scanning envelopes; delivering to Front Desk for hopeful mailing today and filing out mail request form (.6)
P. Birk	01/06/2025	5.1	5.1	Moving items out of weekly intake folder and into individual folders for folks who were sent response letters on Friday; generating new folders where needed; updating mass mailing spreadsheet to reflect new writers (.4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (4.7)
P. Birk	01/07/2025	3.8	3.8	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.6) Generating outgoing response letters from template; generating address labels; printing labels, letters, and attachments; prepping envelopes; scanning envelopes; delivering to Front Desk for hopeful mailing today (.6) Moving items out of weekly intake folder and into individual folders; generating new folders where needed; removing leading numbers from both the items I was moving and a bunch of old documents that had been saved with the leading numbers still intact; updating mass mail list to reflect new writers (.6)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	01/08/2025	3.7	3.7	Pulling up older notes to review class members' loved ones that I have spoken to lately as well as whom I still need to get in touch with; updating and consolidating call list and list of letters / resources to send out (.6) Returning a call to a class member's legal counsel who contacted PJI and was referred to us (.8) Looking back over that class member's recent letter to us and our response, in preparation of sending him another letter (.3) Printing resources to send to class member whose attorney I spoke to today; locating large envelope and label since Reception is not here today; prepping envelope so I can send it out tomorrow after I write a cover letter (.3) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.7)
P. Birk	01/09/2025	1.6	1.6	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.2) Organizing files in DropBox (.4)
P. Birk	01/13/2025	2.6	2.6	Going down the full list of class members sent by LSP to verify legal mail from our mass mailing update; returning email to M/Sgt. Lartigue to confirm that we sent legal correspondence to each of the men on her list (.3) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.3)
P. Birk	01/14/2025	1.6	0.6	Reviewing Mr. Courson's list of discussion topics for the status conference tomorrow as well as attached relevant filings (.3) Verifying legal mail to class member at LSP (.1) <del>Meeting with DWCC team to prepare for status conference with the District Court tomorrow (1.0)</del> Assisting Ms. Bray with gathering bindering materials to use for further prep this evening (.2)
P. Birk	01/15/2025	1.8	0.3	<del>Preparing for and attending status conference with Ms. Bray, Mr. Courson, Judge Foote, and opposing counsel (1.5)</del> Moving files into appropriate dropbox folders (.3)
P. Birk	01/16/2025	1	1	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.0)
P. Birk	01/17/2025	2.1	2.1	Opening, scanning, and saving new letters (.2) Searching online to try to find appropriate PREA information to send to recent caller and her loved one at DWCC (.6) Printing resources to enclose in letters I plan to send out tomorrow (.3) Searching the office for large envelope labels (.3) Returning call to father of class member (.4) Video call with Mr. Childs regarding mother of class member whom we have assisted previously (.3)
P. Birk	01/24/2025	0.7	0	Looking back over recently sent items and verifying legal mail to class members at LSP (.2) Call to return voicemail from a gentleman who runs a halfway house who was trying to see if we had had any contact with a class member who has been released and gone missing (.3) Reviewing voicemail from class member; reviewing past correspondence with him; updating requested calls tracking spreadsheet (.2)
P. Birk	01/27/2025	2.3	2.3	Reviewing and documenting email from class member's loved one that came in over the weekend; drafting, sending, and documenting email response (.7) Drafting follow-up letter to class member wife whom I spoke to recently (.6) Drafting cover / follow-up letter for sending resources to class member who is on lockdown at DWCC (.4) Drafting cover letter for sending copy of remedy phase decision to class member who requested it (.2) Drafting follow-up letter for sending copy of remedial order to class member at DWCC at the request of his personal attorney (.4)
P. Birk	01/28/2025	1.6	1.6	Scanning letters returned as undeliverable and checking housing locations online (.2) Printing cover letters for resources I'm sending out today; generating and printing mail requests; scanning outgoing envelopes; delivering to Front Desk for mailing hopefully today (.3) Scanning more letters returned as undeliverable that came in later in the day and checking housing locations online (.2) Updating mass mailing list to reflect all of the housing changes I identified today (.3) Organizing files (.6)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	01/30/2025	2	2	Moving memos, received letters, response letters, and cover letters into individual complainants' folders in DropBox (.3) Opening, scanning, and saving new letters, including one very lengthy one (.3) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.4)
P. Birk	02/03/2025	0.7	0	Reviewing, memo'ing, and responding to letters in weekly intake folder (.7)
P. Birk	02/04/2025	3.8	3.8	Scanning letters from mass mailing that were returned as undeliverable (.1) Looking up locations online for men whose letters from the mass mailing were returned as undeliverable (.2) Updating mass mailing spreadsheet to reflect changes for those I was able to locate (.2) Generating and printing new address labels for those (.2) Generating and printing cover letters for re-sending (.2) Prepping envelopes with ink stamps, postage stamps, letters, cover letters, and address labels; scanning; delivering to Front Desk for hopeful mailing today (.3) Opening, scanning, and saving letters that came in last week (.2) Brief conversation with Ms. Bray regarding class member who was released and reached out (.3) Opening, scanning, and saving numerous letters that arrived yesterday all at once (.6) Opening, scanning, and saving new letters that arrived today (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.3)
P. Birk	02/05/2025	4.2	4.2	Reviewing and taking notes on voicemail left by class member who has been transferred to another facility (.1) Attempted to return call to father of other class member who reached out recently; left him a voicemail with my direct extension (.1) Call with father of class member who has been transferred to RLCC and is having retaliation concerns (.4) Drafting and sending follow-up email to father with information about ARP process (.3) Updating draft of response letter to class member to reflect father's request that we send some info on the ARP process to him as well (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.1)
P. Birk	02/06/2025	5.3	5.3	Moving files into individual folders; generating new folders where needed (.3) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.0)
P. Birk	02/07/2025	3.6	3.6	Generating response letters from template; gathering and printing enclosures; generating and printing address labels; gathering stamps; prepping envelopes with ink and postage stamps; printing letters; stuffing and sealing envelopes; creating mail request form; scanning envelopes; delivering to Front Desk for hopeful mailing today (1.6) Opening, scanning, and saving letter that came in yesterday (.1) Scanning and saving scan of letters that were returned as undeliverable yesterday (.1) Opening, scanning, and saving new letters that came in today (.4) Organizing physical letters in DWCC files closet and my office (1.4)
P. Birk	02/10/2025	3.3	3.3	Moving items out of weekly intake folder and into individual complainants' folders for those who were sent responses last week; generating new folders where needed; updating mass mailing list to reflect new writers (.3) Verifying legal mail to class members at Angola with M/Sgt. Lartigue in the mail room (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.8)
P. Birk	02/11/2025	1.7	1.7	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.7)
P. Birk	02/12/2025	0.9	0	Calling to confirm legal mail to class member at RLCC with Ms. Bordelon in the mail room (.1) Opening, scanning, and saving letters that came in yesterday (.2) Organizing physical letters and generating plan for expanding files into more file cabinets to help with the overcrowding in the current drawers; inventorying hanging folders and file folders (.6)
P. Birk	02/13/2025	1.4	1.4	Updating folders based on housing locations (.4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.0)
P. Birk	02/14/2025	2.8	2.8	Scanning letters returned as undeliverable (.1) Typing up memos from handwritten call notes taken during calls with class members' family, friends, and advocates as well as a few voicemails from class members (2.2) Drafting response letter to class member who is now housed at Rayburn in response to the Securus voicemail that he left for us (.5)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	02/17/2025	3.7	3.7	Moving memos that I've created over the last few days into their appropriate folders in DropBox now that I know it's okay to move things given the state of the data migration (.2) Typing up memos from handwritten call notes taken during calls with class member family and friends over the last couple of weeks (1.3) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.2)
P. Birk	02/18/2025	4.7	4.7	Generating outgoing response letters from template; sourcing stamps; generating address labels; printing letters and labels; preparing envelopes with ink stamps and postage stamps; printing resources to send with responses; stuffing and sealing envelopes; filling out mail request form; scanning envelopes; delivering to Front Desk for hopeful mailing today (1.1) Moving items out of weekly intake folder and into individual folders for folks being sent responses today; deleting leading numbers in document titles; generating new folders where needed (.3) Reviewing, drafting responses to, and memo'ing letters in weekly intake folder (2.7) Doing all of the same things I did earlier to prep mail to go out, for more letters that I wanted to get into the box today for mailing tomorrow (.6)
P. Birk	02/19/2025	2.6	2.6	Moving items out of weekly intake folder and into individual folders for those whose response letters are going out today; generating new folders where needed; updating mass mail list to reflect new writers, moving files based on housing (.3) Called to confirm recently sent legal correspondence to class members at Rayburn with a gentleman in the mail room (.2) Received an email from LSP to confirm legal mail to class members now housed there; checked my records of outgoing letters, and the two in question were not sent anything since the 12/31/24 mass mailing; responding to M/Sgt. Lartigue to let her know that Rayburn may have forwarded those letters to them, but that I cannot fully confirm (.3) Opening, scanning, and saving new letters - one in particular was fairly lengthy (.4) Organizing physical letters in DWCC files closet (1.4)
P. Birk	02/20/2025	4.4	4.4	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (4.4)
P. Birk	02/21/2025	1.8	1.8	Reviewing voicemail, checking outgoing envelope scan records, and calling back to Rayburn to confirm recently-sent legal mail to class member who is currently housed there (.2) Generating outgoing response letters from template; generating and printing address labels; printing letters; prepping envelopes with ink stamps and address labels; stuffing and sealing envelopes; I searched the office for postage stamps, only found 1 when I need several more; I attempted to log into the website to print my own, but there is now 2-step log-in and I don't know who is in charge of that; I filled out a mail request form and left the letters in the Front Office for hopeful mailing today (after I scanned the envelopes); I emailed Mr. Carter to let him know that these ones will need postage, since mine usually don't (1.3) Updating mass mailing list to reflect new writers (.1) Moving items from weekly intake folder to individual folders for folks whose responses are going out today; generating new folders where needed (.2)
P. Birk	02/24/2025	4.4	4.4	Researching online to see if I could find resources to send to the class member who wrote who is being held past his out date due to not having secured housing on the outside and his status as a sex offender (.6) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.8)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	02/25/2025	3.4	3.4	<p>Scanning and saving letter returned as undeliverable and looking up housing location online (.2)</p> <p>Attempted call to EHCC to confirm legal mail sent to class member now housed there; Ms. Dumas was out to lunch (.1)</p> <p>Looking up locations for other letters that were recently returned as undeliverable; updating mass mailing spreadsheet and folders (.4)</p> <p>Generating cover letters for resending letters returned as undeliverable (.2)</p> <p>Generating response letters from template; generating mailing labels; locating envelopes; prepping envelopes with ink stamps; printing response letters, cover letters, and address labels; locating and printing enclosures and resource documents; stuffing and sealing envelopes; scanning envelopes; delivering to Front Desk for hopeful mailing today (1.3)</p> <p>Calling back to EHCC again; confirming legal mail with Ms. Dumas (.1)</p> <p>Moving items out of weekly intake folder and into individual folders for folks being sent responses today; deleting leading numbers in document titles; generating new folders where needed (.3)</p> <p>Organizing physical letters in my personal office (.3)</p> <p>Organizing physical letters in DWCC files closet (.5)</p>
P. Birk	02/26/2025	0.7	0	<p>Confirming legal mail recently sent to class members now housed at Angola with M/Sgt. Lartigue in the mail room (.2)</p> <p>Gathering file folders and beginning again to work on organizing physical letters in DWCC files closet (.5)</p>
P. Birk	02/28/2025	0.3	0	<p>Returning call to Ms. Dumas in the EHCC mail room to verify legal mail for class members who are now housed there, including hold time on the phone (.3)</p>
P. Birk	03/05/2025	3.8	1.9	<p>Checking scans of outgoing envelopes and verifying legal mail recently sent to class members now housed at LSP with M/Sgt. Lartigue in the mail room (.2)</p> <p>Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (3.6). [total time 5.7]</p>
P. Birk	03/06/2025	4.6	4.6	<p>Generating outgoing response letters from template; printing letters; generating and printing address labels; gathering and printing enclosures; prepping envelopes with ink stamps; scanning outgoing envelopes; delivering to Front Desk for postage application and hopeful mailing today (.8)</p> <p>Scanning envelopes returned as undeliverable and saving scan; looking up housing locations online; generating cover letters for re-sending letters that were returned; generating mail request form; prepping envelopes with everything except postage; delivering to Front Desk for hopeful mailing today (.8)</p> <p>Opening, scanning, and saving new letters (.3)</p> <p>Checking in with Ms. Bray re: the content of one of the letters from a class member who has been moved to the North Compound; updating recommended calls spreadsheet (.4)</p> <p>Reviewing and taking notes on voicemails left today and earlier this week; reviewing emails from class member's loved one; attempted callback to first caller, left a voicemail (.4)</p> <p>Attempted callback to second caller, left a voicemail (.1)</p> <p>Looking back over call memos from previous correspondence with mother of class member who is now housed at Dixon to prepare to speak to her again (.4)</p> <p>Call with same (.6)</p> <p>Organizing physical letters in DWCC files closet and seeking out additional hanging folders around the office (.8)</p>

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	03/07/2025	3.1	3.1	<p>Looking up contact information for providing referrals to mother who called on behalf of her son (.2)</p> <p>Call with mother who reached out on behalf of her son (.6)</p> <p>Follow-up email to share the referrals with the mother that we talked about on our call (.2)</p> <p>Scanning letter that was returned as undeliverable; attempting to look up location online (.2)</p> <p>Opening, saving, and scanning new letters (.3)</p> <p>Email to Ms. Bray to alert her to concerning letter from class member (.2)</p> <p>Looking up Allen Parish jail info online; attempted call, followed prompts, and selected the option to speak to jail administration - it rang several minutes but no one answered (.1)</p> <p>Tried again and selected the option to "speak to the jail;" someone answered and was distracted, yelled at someone else in the background; once I was finally able to explain why I was calling, they verified that our client is there but said I needed to talk to the warden to schedule a call; they transferred me, and the call was answered by a voicemail system; I did not leave a vm but will call back and select the option to speak to the warden (.2)</p> <p>Called back and left a voicemail on the warden's direct extension with a request that he call me back to let me know how to schedule an attorney phone call (.2)</p> <p>Opening, scanning, and saving other new letter that arrived today; looking back through old files to see if we have heard from this individual before (.3)</p> <p>Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (.6)</p>
P. Birk	03/10/2025	5	5	<p>I missed a call over lunch from a class member's sister whom I left a message for last week; reviewed and attempted a call back; missed her again and will try tomorrow (.1)</p> <p>Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (4.9)</p>
P. Birk	03/11/2025	3.8	3.8	<p>Opening, scanning, and saving new letters (.2)</p> <p>Generating outgoing response letters from template; gathering and printing enclosures; generating and printing address labels; printing letters; applying ink stamps to envelopes; stuffing and sealing envelopes; prepping mail request form; scanning outgoing envelopes; delivering to Front Desk for hopeful mailing today (.8)</p> <p>Moving items out of weekly intake folder and into individual folders for folks being sent responses today; generating new folders where needed; updating mass mailing spreadsheet to reflect new writers (.4)</p> <p>Reviewing status of collecting records for class member whose retained attorney requested them; following up with Ms. Bray to let her know I can continue pulling records together for them tomorrow (.4)</p> <p>Organizing physical letters in my personal office prior to transferring them to the DWCC files closet (.6)</p> <p>Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.4)</p>
P. Birk	03/12/2025	0.8	0.4	<p>Calling to Parish jail where a class member is currently being housed in order to speak to the Warden and schedule a confidential attorney phone call in response to his recent letter - includes transfer and hold times (.3)</p> <p>Checking in with Ms. Bray and putting call with class member on her calendar (.2)</p> <p>Received a letter to a class member which was returned as undeliverable for being slightly too bulky and needing more postage; generated and printed a cover letter for re-sending; prepped address label and put ink stamps on envelope; printed mail request and scanned envelope; delivered to Front Desk to mail tomorrow (.3). [total time reduced by 50%]</p>
P. Birk	03/13/2025	3	3	<p>Combing through records and making copies of items for class member who requested we send his records to his retained attorney; once I was sure I had gathered them all, I sent a link to Ms. Bray to share with the attorney (1.2)</p> <p>Confirming legal correspondence to class member currently housed at LSP with M/Sgt. Lartigue in the mail room (.1)</p> <p>Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.7)</p>
P. Birk	03/14/2025	1.7	1.7	<p>Confirming Legal mail to class member now housed at LSP with M/Sgt. Lartigue in the mail room (.1)</p> <p>Left VM for class member's sister who called and whom I haven't been able to get back in touch with (.1)</p> <p>Class member's sister called back; I spoke to her and let her know I would place him on the requested calls list for our attorneys to get in touch soon (.6)</p> <p>Organizing physical letters in DWCC files closet (.9)</p>

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	03/17/2025	5.4	5.4	Confirming recent legal correspondence sent to class members who are now housed at RLCC with the mail room officer there (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.2)
P. Birk	03/18/2025	3.2	3.2	Scanning and saving envelope returned as undeliverable and looking up correct housing location online (.1) Generating cover letter for re-sending returned letter; printing letter and address label and mail request form; prepping envelope with everything except postage; scanning; delivering to Front desk for hopeful mailing today (.3) Opening, scanning, and saving letters that were delivered Friday or yesterday (.4) Call with Ms. Bray regarding logistics and plans for upcoming site visit (.2) Reviewing response letters sent out since the beginning of the year, call and letter memos, and other documentation on class members' files in our records to determine who needs to be on our visit list (2.2)
P. Birk	03/20/2025	6.1	6.1	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.4) Organizing files and updating mass mailing list based on current housing locations (.7)
P. Birk	03/21/2025	2.4	2.4	Checking recent envelope scans and confirming legal mail to class members now housed at Angola with M/Sgt. Lartigue in the mail room (.2) Generating response letters from template; printing letters; generating and printing address labels; gathering and printing enclosures; prepping envelopes with ink stamps and postage; scanning outgoing envelopes; filling out mail request form; filing form and placing letters in Front Office for hopeful mailing today (.8) Drafting cover letter for sending items to class member / witness who requested copies of the lawsuit; printing complaint and both decisions and troubleshooting printer; prepping large expanding envelope and mail request form; scanning; leaving in Front Office for anticipated postage and mailing on Monday (.8) Moving items out of weekly intake folder and into individual folders for folks being sent responses today; generating new folders where needed; moving folders based on housing; updating mass mailing spreadsheet to reflect new writers (.3) Opening, scanning, and saving new letters, including one with copious enclosures (.3)
P. Birk	03/24/2025	3.1	3.1	Checking records of outgoing letters and confirming legal mail recently sent to class members now housed at Angola with M/Sgt. Lartigue in the mail room (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.9)
P. Birk	03/25/2025	3.5	3.5	Calling to confirm legal correspondence with Ms. Dumas in the EHCC mail room after she left us a voicemail yesterday (.2) Updating mass mail spreadsheet to reflect new housing location for class member who was sent to Hunt (.1) Scanning and saving envelopes returned as undeliverable; looking up current housing locations online; updating mass mailing spreadsheet to reflect changes to housing (.4) Generating cover letters for re-sending returned letters; generating address labels; printing cover letters and labels; prepping envelopes for mailing (.4) Generating mail request forms, scanning outgoing letters, and leaving in Front Office for hopeful mailing tomorrow (.3) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.1)
P. Birk	03/26/2025	2.3	2.3	Call with brother of class member who is currently housed on the South Compound and experiencing mental health decompensation (.6) Generating outgoing response letters from template; generating address labels; printing letters, labels, and resource enclosures; prepping and scanning outgoing envelopes; delivering to front office for hopeful mailing today (.7) Moving items out of weekly intake folder and into individual folders for folks being sent responses today; generating new folders where needed; updating mass mailing spreadsheet to reflect housing changes (.2) Organizing letters in DWCC files closet and evaluating status of file cabinets and making plan for expanding into more drawers while I continue getting everything into folders (.8)
P. Birk	03/27/2025	3.2	1.6	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.3) Organizing files in DWCC files closet (.9). [total time reduced by 50%]

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	03/31/2025	1.1	1.1	Verifying legal correspondence with class members now housed at Angola with M/Sgt. Lartigue in the mail room (.2) Generating call memos from Ms. Bray's call notes with class members last week and saving to individual folders; reviewing notes to determine actions I need to take (.4) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (.5)
P. Birk	04/01/2025	2.5	2.5	I attempted several calls to the EHCC mail room, to confirm legal mail sent to class members who are now being housed there. Every time the person who answered tried to transfer me to the mail room, the call either dropped, or it rang once and then there was neither more ringing nor anyone on the line (.2) Opening and scanning new letters received over the weekend and Monday (.4) Naming and moving new letters into weekly intake folder (.2) Generating cover letter for sending items to class member who requested them (.3) Printing complaint, both decisions, remedial order, and judgment for class member who requested them; mild troubleshooting on copy machine (.5) Prepping to mail; scanning; and delivering to Front Office for mailing tomorrow (.2) Moving files into appropriate locations based on housing updates (.4) Received another voicemail from a class member's mother whom I've been playing "phone tag" with for a couple of weeks; she suggested that I could leave her my email address in a voicemail and she can reach out that way; called back and left her a vm with that info and let her know I will add her to my known contacts so I shouldn't miss her message (.2) Continuing attempting calls back to Hunt mail room - they must be having phone issues on their end (.1)
P. Birk	04/02/2025	2.5	2.5	Drafting and sending extremely long email to Ms. Blackmon to provide her with information about the case, prisons in the state, the ARP process, and the handling of prison or jail intakes with information and referral (1.2) I tried again to call and verify legal mail with Hunt; the mail room direct number rang once and cut out; the main prison phone number rang and rang but no one answered (.1) Organizing physical letters in DWCC files closet and cleaning out file cabinet to expand into (1.2)
P. Birk	04/03/2025	2.4	2.4	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder, including extremely long letter from class member currently on the South Compound (2.4)
P. Birk	04/04/2025	1.6	1.6	Once again tried to get in touch with the mail room at Hunt to verify recent legal mail sent to class members who were transferred there; the assistant who answered the main line would not listen to me when I told her that there is something wrong with the mail room phone line and it keeps dropping the calls; she ultimately transferred me to someone in another department, who was willing to take my direct extension and share it with whomever is in the mail room today [time includes hold time on the phone] (.3) Generating outgoing response letters from template; generating address labels; printing labels, letters, enclosures, and mail request forms; prepping envelopes; delivering to Front Desk for mailing today (.7) Moving items out of weekly intake folder and into individual folders for folks being sent responses today (.1) Opening, scanning, and saving new letter received yesterday (.1) Scanning and saving letter returned as undeliverable and looking up recipient's current housing location online (.2) Opening, scanning, and saving new letters received today (.2)
P. Birk	04/07/2025	1.4	1.4	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.4)
P. Birk	04/08/2025	1.3	0.65	Opening, scanning, and saving new letters from yesterday / the weekend (.2) Opening, scanning, and saving new letter received today (.1) Call with close family friend of class member currently on extended lockdown (.6) Reviewing email and documents sent by class member's sister and beginning to draft response email (.1) <small>Total time reduced by 500/1</small>
P. Birk	04/09/2025	1.2	1.2	Drafting and sending I&R email to sister of class member currently on lockdown at DWCC (.7) Typing memo of recent class member family member call from handwritten call notes and moving into correct individual folder (.5)
P. Birk	04/14/2025	2.3	2.3	Generating PDFs of recent email communications with loved ones of class members; creating new folders in DropBox for new complainants; moving PDFs, memos, and attachments into the correct folders (.3) Typing up call notes from two long calls with mother of former class member who is housed at Dixon (.8) Typing other handwritten notes into memos and adding to class members' folders (1.2)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	04/15/2025	3.3	3.3	Typing up memos from handwritten call notes and saving to individual class members' folders in DropBox (2.6) Drafting response letters to go out to still-incarcerated class members who have left voicemails or placed Securus calls in the last week (.7)
P. Birk	04/16/2025	1.6	1.6	Opening, scanning, and transferring scans of all prison letters received in the last week (.5) Same with more new letters, including very lengthy one sent by class member who writes regularly and includes many enclosures (.3) Printing outgoing letters and enclosures; generating and printing address labels; prepping envelopes to mail out today; scanning outgoing envelopes and filling out mail form (.3) Moving files into individual DropBox folders for folks getting responses mailed out today (.2) Calling back to former class member who is out of custody; he wants a copy of the lawsuit and the decisions and remedial order; provided a general update on things and got his mailing address (.3)
P. Birk	04/17/2025	0.7	0	Memo'ing call notes from call yesterday with former class member now out of custody (.1) Printing and prepping items he requested to hopefully mail out today or tomorrow (when I can get to the post office) (.2) Left a voicemail for mother of class member who is being held on lockdown past his release date at DWCC, in response to her recent voicemail to us (.1) Drafting and printing cover letter for sending materials to class member (.3)
P. Birk	04/18/2025	0.5	0	Opening, scanning, and renaming and transferring scans of new letters (.3) Organizing physical letters in personal office (.2)
P. Birk	04/21/2025	4.9	4.9	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (4.9)
P. Birk	04/22/2025	1	0	Communicating with Ms. Hammond regarding the state of the data migration and what files I can or cannot access (.2) Scanning letter returned as undeliverable (.1) Opening and scanning new letter (.1) Organizing physical letters in office (.0)
P. Birk	04/23/2025	3	0.2	<del>Status conference with Judge Foote, and following up / debriefing with Ms. Bray and Mr. Courson afterwards; updating calendar, etc. (1.4)</del> Receiving, signing for, and opening package delivered by FedEx containing records for class member (.1) Printing cover sheets for scanning records in sections (.1) <del>Overall time spent going back and forth to the copy machine, unjamming jams, separating records, scanning all records for class member, and checking after each scan to ensure all pages came through (1.4)</del>
P. Birk	04/24/2025	1.6	0	Downloading 24 scans of class member's medical records from scan emails; generating new folder for storing until they can be uploaded to the Drive; manually combining each of the scans using PDF software; troubleshooting software; adding up pages from individual scans to ensure all pages are accounted for in the big combined pdf (1.6)
P. Birk	04/25/2025	3.2	3.2	Generating response letters from memos; generating address labels; printing letters, labels, and enclosures; prepping envelopes with ink stamps, postage stamps, and address labels; stuffing and sealing envelopes; scanning outgoing envelopes; preparing and filing mail request forms; generating temporary holding folder on my desktop and moving memos and responses there until the data migration is complete and I can move them to the DWCC folder - everything took longer than usual due to working on just my laptop screen with no monitor since I am covering the Front Desk and also since I kept having to go back and forth to my own office (.8) Conferring with Ms. Bray regarding record review for class member (.3) Opening and scanning new letters; downloading scans from emails, renaming, and moving into working folder (.2) Beginning process of reviewing medical records for class member to pull out information requested by Ms. Bray (1.9)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	04/28/2025	4	2	Updating titles on documents to remove or add leading numbers; relocating items from "move after data migration" folder to their appropriate places; moving letters from weekly intake folder into individual complainants' folders for folks who were sent responses last week; generating new folders where needed. It was my first time moving things in GoogleDrive, and the process was a little clunky, so it took me a while to ensure everything went to the right place. (1.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.8). [total time reduced by 50%]
P. Birk	04/29/2025	2.2	2.2	Moving more files into their proper folders in the DWCC GoogleDrive (.3) Opening, scanning, and naming and moving scans of new prison letters received since Friday (.3) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.6)
P. Birk	05/01/2025	1.8	1.8	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.8)
P. Birk	05/02/2025	0.1	0	Opening, scanning, and naming and moving scan of new letter (.1)
P. Birk	05/05/2025	5.6	5.6	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (5.6)
P. Birk	05/06/2025	3.3	3.3	Opening and scanning, and renaming and moving new letters (.2) Finishing reviewing, memo'ing, and drafting responses to all letters currently in the weekly intake folder (3.1)
P. Birk	05/07/2025	3.2	3.2	Generating outgoing letters from template; generating address labels, including one large label; printing letters and labels; locating and printing enclosures; troubleshooting copy machine; prepping envelopes with ink stamps, postage stamps, and address labels; stuffing and sealing envelopes; filling out mail request forms; scanning outgoing envelopes and depositing in Front Office tray for hopeful mailing today (1.2) Moving files out of weekly intake folder and into individual folders for folks being sent responses today; generating new folders and subfolders where needed; editing document titles to remove leading numbers; updating mail list (.4) Reviewing, memo'ing, and drafting a response to letter from Spanish speaking gentleman in custody; this includes time to manually translate his letter (1.3) Generating outgoing response letter from template; generating mailing address label; prepping envelope; gathering enclosure; scanning envelope to mail tomorrow (.2) Generating new folder and subfolder for new writer and moving items out of weekly intake folder and into his folders (.1)
P. Birk	05/09/2025	1	1	Meeting with Ms. Bray and Mr. Courson to discuss scheduling order and to-do list (1.0)
P. Birk	05/12/2025	1.4	1.4	Confirming legal mail sent to former class members currently being housed at LSP with M/Sgt. Lartigue in the mail room (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (1.2)
P. Birk	05/13/2025	1.1	0.55	Watching Louisiana House of Representatives session discussion of HB193, with consideration of how it might impact our class members and/or the future of our litigation (.3) Calling back to Raymond Laborde mail room to verify legal correspondence to class member who got moved there; they have another letter that I did not send but which says it came from us; searching in Drive and Filemaker to determine if anyone might have sent it; emailing FAIR team re: same (.3) Continuing to look through old files to determine the scope of interaction we have had with the gentleman at RLCC (.2) Locating previous request for expanding envelopes to use when we send out the full decisions to class members who request them; submitting a supplies request form on the DRLA intranet to request a new pack (.2) Calling back to mail room again to verify that we did not send one of the letters they were calling to receive. (.1) [total time reduced by 50%]
P. Birk	05/14/2025	1.2	0	Opening, scanning, and naming and moving scans of new letters (.2) Reading over memo, proposed order, and motion submitted by the State (.2) Reviewing, memo'ing, and drafting response to letter in weekly intake folder (.6) Opening, scanning, and naming and relocating scan of lengthy new letter that was received today (.2)
P. Birk	05/15/2025	3.4	1.7	Downloading, reviewing, identifying, and titling all DWCC related documents I scanned yesterday; searching through Drive to determine whether those items were already preserved in digital form; moving items out of my downloads folder and into their proper places in the Wade folder in Drive (2.4) Reviewing, memo'ing, and drafting responses to lengthy letter in weekly intake folder (1.0) [total time reduced by 50%]
P. Birk	05/23/2025	0.2	0	Opening, scanning, and naming and moving scans of new prisoner letters received this week (.2)

Staff	Date	Time Worked	Time Requested	Activity
P. Birk	05/27/2025	3.2	3.2	Opening, scanning, and naming and transferring scans of new letters from incarcerated individuals (.2) Reviewing and memo'ing voicemail left by former class member who is now housed at Rayburn CC (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.8)
P. Birk	05/28/2025	0.9	0.9	Left a return voicemail for the fiancee of a class member who is currently on lockdown; reviewed memos from our previous correspondence (.3) Opening, scanning, and naming and moving scan of new lengthy letter from class member (.2) Working on reviewing and memo'ing one lengthy letter; was interrupted by a request for assistance with another matter and will have to finish tomorrow (.4)
P. Birk	05/29/2025	2.5	2.5	Reading over the letter that the Defendants submitted to the 5th Circuit (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.3)
P. Birk	05/30/2025	0.5	0	Reading over our memo in opposition to the renewed motion for a stay in the district court as well as our letter to the 5th circuit in response to the one def's sent (.3) Call with fiance of class member (.2)
P. Birk	06/04/2025	2	2	Meeting with Ms. Bray and Mr. Courson to discuss scheduling order and other upcoming items (1.4) Generating outgoing response letters from template; printing letters and enclosures; generating and printing mailing labels; prepping envelopes with ink and postage stamps and labels; stuffing and sealing envelopes; scanning outgoing envelopes and delivering to Front Office for hopeful mailing today (.4) Moving items out of weekly intake folder and into individual folders, generating new folders and subfolders where needed; took longer than usual due to working on the laptop without a monitor (.2)
P. Birk	06/05/2025	0.7	0.7	Reviewing, memo'ing, and drafting response to letter in weekly intake folder, including online research into the organization that wrote on behalf of a class member (.7)
P. Birk	06/06/2025	1.1	1.1	Looking through ECF folder and reading over proposed scheduling order to ensure we have covered all necessary items (.4) Opening and scanning new letters; downloading and renaming scanned letters; moving into Weekly Intake Folder (.3) Reading over the Court's Order denying def's motion to stay (.2) Reading the final version of our proposed scheduling order (.1) Reading def's proposed scheduling order (.1)
P. Birk	06/09/2025	1.5	1.5	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder and emails from advocates (1.5)
P. Birk	06/10/2025	0.7	0	Reading over our motion for leave to conduct cellfront interviews (.1) Opening, scanning, and renaming and moving scans of new letters, includes manually scanning 50-page document that kept jamming the copier (.6)
P. Birk	06/11/2025	0.8	0	Once I was able to get my GoogleDrive re-synced, I had to re-scan and re-save a couple of recent letters; also moved files that had not properly copied over (.3) Organizing physical letters in office (.5)
P. Birk	06/12/2025	2.9	2.9	Memo'ing and drafting response to email from advocate regarding individuals with mental health disabilities in a prison setting (.6) Received deadlines from the Court for def's to file a response to our request for cell front interviews and for us to file a reply thereafter; updated team calendar and running to-do list spreadsheet (.2) Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.1)
P. Birk	06/12/2025	2.9	2.9	Memo'ing and drafting response to email from advocate regarding individuals with mental health disabilities in a prison setting (.6)
P. Birk	06/16/2025	1	1	Confirming legal mail to class member who has been moved to Raymond Laborde CC with Lieutenant Dawkins in
P. Birk	06/17/2025	1.5	1.5	Opening, scanning, and naming and moving scans of new letters, including very lengthy one (.4)
P. Birk	06/18/2025	0.6	0.6	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (.6)
P. Birk	06/23/2025	2.9	2.9	Reviewing, memo'ing, and drafting responses to letters in weekly intake folder (2.9)
P. Birk	06/24/2025	2.9	2.9	Opening, scanning, and naming and moving scans of new prison letters (.2)
		443.1	400.95	<b>TOTAL</b>

<u>Date</u>	<u>Detail</u>	<u>Cost</u>
5/17/2022	Stamps for mass mailing dated 5/24/2022	\$278.25
7/28/2022	Stamps for mass mailing dated 7/29/2022	\$114
10/13/2022	Stamps for mass mailing dated 10/14/2022	\$342
3/1/2023	Stamps for mass mailing dated 3/6/2023	\$360
2/1/2024	Stamps for mass mailing dated 2/12/2024	\$368
7/22/2024	Stamps for mass mailing dated 7/31/2024	\$414.00
8/21/2024	Stamps for mass mailing dated 12/31/2024	\$379.50
<b>MASS MAILING TOTAL</b>		<b>\$2,255.75</b>

<u>Date</u>	<u>Detail</u>	<u>Cost</u>
9/30/21	Large letter	\$1.76
9/30/2021	Large letter	\$3.56
9/30/2021	27 letters at \$0.53 each	\$14.31
10/12/2021	1 letter	\$0.53
10/19/2021	21 letters at \$0.53 each	\$11.13
10/29/2021	Large letter	\$9.24
2/15/2022	15 letters at \$0.53 each	\$7.95
2/15/2022	24 letters at \$0.53 each	\$12.72
2/16/2022	24 letters at \$0.53 each	\$12.72
2/22/2022	1 letter	\$0.73
4/2/2022	36 letters at \$0.53 each	\$19.08
4/6/2022	1 letter	\$0.53
5/11/2022	7 letters at \$0.53 each	\$3.71
5/31/2022	2 letters at \$0.53 each	\$1.06
7/15/2022	55 letters at \$0.57 each	\$31.35
7/21/2022	12 letters at \$0.57 each	\$6.84

Exhibit 1-C to Bray  
Declaration

<u>Date</u>	<u>Detail</u>	<u>Cost</u>
7/21/2022	Large letter	\$2.88
7/21/2022	Large letter	\$1.68
8/30/2022	18 letters at \$0.57 each	\$10.26
8/31/2022	Large letter	\$2.64
9/6/2022	1 letter	\$0.57
9/8/2022	14 letters at \$0.57 each	\$7.98
9/8/2022	Large letter	\$2.64
9/8/2022	Large letter	\$1.92
9/8/2022	Large letter	\$4.08
9/8/2022	Large letter	\$3.60
9/8/2022	Large letter	\$4.08
9/9/2022	19 letters at \$0.57 each	\$10.83
9/9/2022	Large letter	\$2.64
9/12/2022	14 letters at \$0.57 each	\$7.98
9/12/2022	Large letter	\$2.64
9/19/2022	Large letter	\$1.92
9/19/2022	Large letter	\$2.64
9/19/2022	22 letters at \$0.57 each	\$12.54
12/8/2022	8 letters at \$0.57 each	\$4.56
1/4/2023	1 letter	\$0.57
1/4/2023	13 letters at \$0.57 each	\$7.41
1/5/2023	11 letters at \$0.57 each	\$6.27
1/13/2023	9 letters at \$0.57 each	\$5.13
2/22/2023	7 letters at \$0.57 each	\$3.99

<u>Date</u>	<u>Detail</u>	<u>Cost</u>
2/23/2023	7 letters at \$0.57 each	\$3.99
2/24/2023	7 letters at \$0.57 each	\$3.99
2/28/2023	4 letters at \$0.57 each	\$2.28
2/28/2023	11 letters at \$0.60 each	\$6.60
4/28/2023	48 letters at \$0.60 each	\$28.80
5/5/2023	24 letters at \$0.60 each	\$14.40
5/17/2023	17 letters at \$0.60 each	\$10.20
5/23/2023	6 letters at \$0.60 each	\$3.60
6/14/2023	5 letters at \$0.60 each	\$3.00
6/27/2023	5 letters at \$0.60 each	\$3.00
7/5/2023	5 letters at \$0.60 each	\$3.00
7/10/2023	3 letters at \$0.60 each	\$1.80
7/10/2023	4 letters at \$0.63 each	\$2.52
7/14/2023	4 letters at \$0.63 each	\$2.52
7/20/23	7 letters at \$0.63 each	\$4.41
8/2/2023	5 letters at \$0.63 each	\$3.15
8/8/2023	Large letter	\$3.99
8/8/2023	7 letters at \$0.63 each	\$4.41
8/17/2023	6 letters at \$0.63 each	\$3.78
8/30/2023	8 letters at \$0.63 each	\$5.04
9/12/2023	8 letters at \$0.63 each	\$5.04
9/15/2023	4 letters at \$0.63 each	\$2.52
9/29/2023	4 letters at \$0.63 each	\$2.52
10/10/2023	Large letter	\$2.55

<u>Date</u>	<u>Detail</u>	<u>Cost</u>
10/10/2023	12 letters at \$0.63 each	\$7.56
10/19/2023	3 letters at \$0.63 each	\$1.89
11/1/2023	6 letters at \$0.63 each	\$3.78
11/3/2023	6 letters at \$0.63 each	\$3.78
11/15/2023	3 letters at \$0.63 each	\$1.89
11/21/2023	7 letters at \$0.63 each	\$4.41
12/5/2023	3 letters at \$0.63 each	\$1.89
12/14/2023	3 letters at \$0.63 each	\$1.89
12/28/2023	6 letters at \$0.63 each	\$3.78
1/12/2024	7 letters at \$0.63 each	\$4.41
2/6/2024	1 letter	\$0.63
2/19/2024	7 letters at \$0.64 each	\$4.48
2/22/2024	5 letters at \$0.64 each	\$3.20
3/1/2024	2 letters at \$0.64 each	\$1.28
3/1/2024	1 letter	\$0.64
3/6/2024	6 letters at \$0.64 each	\$3.84
3/11/2024	1 letter	\$0.64
3/13/2024	4 letters at \$0.64 each	\$2.56
3/22/2024	2 letters at \$0.64 each	\$1.28
3/27/2024	4 letters at \$0.64 each	\$2.56
3/29/2024	5 letters at \$0.64 each	\$3.20
4/16/2024	2 letters at \$0.64 each	\$1.28
4/23/2024	3 letters at \$0.64 each	\$1.92
5/15/2024	5 letters at \$0.64 each	\$3.20

<u>Date</u>	<u>Detail</u>	<u>Cost</u>
5/23/2024	5 letters at \$0.64 each	\$3.20
5/29/2024	2 letters at \$0.64 each	\$1.28
5/31/2024	5 letters at \$0.64 each	\$3.20
6/4/2024	5 letters at \$0.64 each	\$3.20
6/18/2024	9 letters at \$0.64 each	\$5.76
6/24/2024	5 letters at \$0.64 each	\$3.20
6/28/2024	3 letters at \$0.64 each	\$1.92
7/3/2024	4 letters at \$0.64 each	\$2.56
7/10/2024	7 letters at \$0.64 each	\$4.48
8/6/2024	1 letter	\$0.69
8/21/2024	10 letters at \$0.69 each	\$6.90
9/20/2024	2 letters at \$0.69 each	\$1.38
10/4/2024	4 letters at \$0.69 each	\$2.76
10/11/2024	1 letter	\$0.69
10/18/2024	7 letters at \$0.69 each	\$4.83
10/25/2024	11 letters at \$0.69 each	\$7.59
10/29/2024	4 letters at \$0.69 each	\$2.76
11/1/2024	4 letters at \$0.69 each	\$2.76
11/21/2024	1 letter	\$0.69
11/22/2024	2 letters at \$0.69 each	\$1.38
1/3/2025	8 letters at \$0.69 each	\$5.52
1/7/2025	9 letters at \$0.69 each	\$6.21
2/4/2025	4 letters at \$0.69 each	\$2.76
2/7/2025	14 letters at \$0.69 each	\$9.66

<u>Date</u>	<u>Detail</u>	<u>Cost</u>
2/18/2025	8 letters at \$0.69 each	\$5.52
2/19/2025	5 letters at \$0.69 each	\$3.45
2/21/2025	7 letters at \$0.69 each	\$4.83
2/25/2025	11 letters at \$0.69 each	\$7.59
3/6/2025	3 letters at \$0.69 each	\$2.07
3/6/2025	4 letters at \$0.69 each	\$2.76
3/11/2025	9 letters at \$0.69 each	\$6.21
3/13/2025	2 letters at \$0.69 each	\$1.38
3/18/2025	2 letters at \$0.69 each	\$1.38
3/21/2025	11 letters at \$0.69 each	\$7.59
3/26/2025	4 letters at \$0.69 each	\$2.76
3/26/2025	5 letters at \$0.69 each	\$3.45
4/4/2025	1 letter	\$0.69
4/16/2025	2 letters at \$0.69 each	\$1.38
4/25/2025	5 letters at \$0.69 each	\$3.45
5/7/2025	10 letters at \$0.69 each	\$6.90
5/8/2025	1 letter	\$0.69
6/4/2025	4 letters at \$0.69 each	\$2.76
6/25/2025	5 letters at \$0.69 each	\$3.45
<b>REGULAR LETTERS TOTAL</b>		<b>\$594.73</b>

<b>GRAND TOTAL</b>	<b>\$2,850.48</b>
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